

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

vs.

Case Number: 1:12-cv-00257-JB-LFG

LARRY GOLDSTONE, CLARENCE G. SIMMONS,
III, and JANE E. STARRETT,

Defendants.

**DECLARATION OF ALANNA BUCHANAN IN FURTHER SUPPORT OF
DEFENDANTS' MOTION TO DISMISS**

DECLARATION OF ALANNA BUCHANAN

I, Alanna Buchanan, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and am admitted *pro hac vice* before this Court for the purposes of this litigation. I am a senior associate at the law firm of Wilmer Cutler Pickering Hale and Dorr LLP, counsel for Defendants Larry Goldstone and Clarence Simmons (“Defendants”) in the above-entitled action. I respectfully submit this declaration in further support of Mr. Goldstone’s and Mr. Simmons’ motion to dismiss. I have personal knowledge of the facts stated herein and, if called as a witness, I could and would testify competently thereto.

2. Pursuant to Local Rule 10.5, the Parties agreed on May 7, 2012 that the exhibits filed in support of the Motion to Dismiss may exceed 50 pages.

3. Attached hereto are the following exhibits submitted in further support of Mr. Goldstone’s and Mr. Simmons’ Motion to Dismiss:

- **Exhibit 40** is a true and correct copy of a February 21, 2008 email from Deborah Burns to Larry Goldstone, copying Clay Simmons, Jane Starrett and Nathan Fellers with the subject “TMST 2008-1 update.”
- **Exhibit 41** is a true and correct copy of a document introduced by the SEC in *In the Matter of Thornburg Mortgage, Inc.*, File No. D-2968-A (the “Investigation”), as Government Exhibit 35, a Master Repurchase Agreement, dated September 14, 2007, and executed by Greenwich Capital Markets, Inc. and Thornburg Mortgage, Inc.
- **Exhibit 42** is a true and correct copy of the Master Repurchase Agreement between Credit Suisse First Boston Corporation and Thornburg Mortgage Asset Corporation, dated September 20, 1997.
- **Exhibit 43** is a true and correct copy of relevant excerpts of the transcript of Larry Goldstone’s SEC investigative testimony, taken on March 16, 2010.

4. Per Local Rule 10.6, boxes have been placed around those portions of the exhibits that Defendants wish to bring to the Court's attention.

I declare under the penalty of perjury that the foregoing is true and correct. Executed this 20th day of July at Washington, District of Columbia.

By: /s/ Alanna Buchanan
Alanna Buchanan

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 20, 2012, the foregoing Declaration of Alanna Buchanan in Support of Reply in Support of Motion to Dismiss on Behalf of Defendants Larry Goldstone and Clarence G. Simmons and Exhibits thereto was electronically filed with the Clerk of Court using the CM/ECF system that will send notification of such filing to all counsel of record:

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